

August 10, 2005

**Subscriber Notification Report**  
**WC Docket No. 05-196**

FeatureTel is a small Hosted VoIP provider which only provides service to businesses in our local area. We work with only one local CLEC and have a standing relationship with that provider to handle E911 properly since our inception. Our implementation process for every client includes free hands-on instructor-led training sessions for every user. During these sessions, each user is given a user handbook – the ‘FeatureTel Quick Start Guide’. The first topic covered in the guide is ‘E911 Functionality’.

FeatureTel’s compliance efforts report:

- A detailed description of all actions the provider has taken to specifically advise every subscriber, prominently and in plain language, of the circumstances under which E911 service may not be available through the interconnected VoIP service and/or may be in some way limited by comparison to traditional E911 service. This information should include, but is not limited to, relevant dates and methods of contact with subscribers (*i.e.*, e-mail, U. S. mail);
  - FeatureTel has provided every new subscriber with a detailed description of the E911 service since July 2004.
  - E911 functionality is verbally addressed in all training sessions for new users.
  - Documentation used in training sessions includes E911 service description.
  - Day-to-day reference material used by users includes E911 documentation.
  - Per the notification provisions of the Federal Communications Commission’s rules governing enhanced 911 (E911) capability, an E-mail was sent out to every subscriber on 7/27/2005.
  - Telephone calls were made to those contacts who had not responded by the close of business 7/28/2005.
  - A second e-mail was sent out to those contacts who had still not responded by the close of business 7/28/2005.
  - Additional telephone calls were placed to contacts who had not yet responded as of 8/8/2005.
  - The only subscribers who have not responded by the date of this report are those who are traditionally very hard to get a hold of, or are potential ‘bad debt clients’.

- A quantification of how many of the provider's subscribers, on a percentage basis, have submitted an affirmative acknowledgement, as of the date of the report, and an estimation of the percentage of subscribers from whom they do not expect to receive an acknowledgement by August 29, 2005;
  - 94% have provided affirmative acknowledgement as of 8/10/2005.
  - We are quite small and have almost weekly contact with almost every client. We do expect to receive an acknowledgement from 100% of our subscribers.
  - We estimate that our non-response rate will be 0% by August 29, 2005.
- A detailed description of whether and how the provider has distributed to all subscribers warning stickers or other appropriate labels warning subscribers if E911 service may be limited or not available and instructing the subscriber to place them on and/or near the customer premises equipment used in connection with the interconnected VoIP service. This information should include, but is not limited to, relevant dates and methods of contact with subscribers (*i.e.*, e-mail, U. S. mail);
  - FeatureTel distributes E911 information to every business and every user in the Quick Start Guide, which is used by the users for day-to-day reference.
  - The Quick Start Guide is what users refer to every day.
  - In addition, FeatureTel includes E911 information on the Quick Reference Card which is distributed with every phone. Users also keep this card on and/or near the phones.
  - This information has always been distributed to every new subscriber, by hand, in person, on the date of the training sessions.
- A quantification of how many subscribers, on a percentage basis, to whom the provider did not send the advisory described in the first bullet above and/or to whom the provider did not send warning stickers or other appropriate label as identified in the bullet immediately above;
  - FeatureTel did send the required advisory to 100% of its subscribers

- A detailed description of any and all actions the provider plans on taking towards any of its subscribers that do not affirmatively acknowledge having received and understood the advisory, including, but not limited to, disconnecting the subscriber's VoIP service with the Company no later than August 30, 2005;
  - FeatureTel will continue to send e-mails and make telephone calls to the few subscribers who have yet to respond.
  - In compliance with this order, FeatureTel will disconnect any subscriber's VoIP service who has not responded by the August 30, 2005 deadline.
- A detailed description of how the provider is currently maintaining any acknowledgements received from its subscribers; and
  - All e-mail correspondence is being archived for future reference (notifications and responses)
  - A spreadsheet is being maintained to track and record the contact dates for each contact
- The name, title, address, phone number, and e-mail address of the person(s) responsible for the Company's compliance efforts with the *VoIP E911 Order*.
  - Paul Levering
  - CEO
  - 5448 Apex Peakway #112 Apex, NC 27502
  - 919-459-2310
  - paul@featuretel.com

## Filing Procedures

Interconnected VoIP providers may file the above-referenced reports in this proceeding on or before August 10, 2005. All reports must reference WC Docket No. 05-196 and should be labeled clearly on the first page as “Subscriber Notification Report.” The report may be filed using: (1) the Commission’s Electronic Comment Filing System (ECFS), or (2) by filing paper copies. *See* Electronic Filing of Documents in Rulemaking Proceedings, 63 Fed. Reg. 24,121 (May 1, 1998).

- **Electronic Filers:** Compliance letters may be filed electronically using the Internet by accessing the ECFS: <http://www.fcc.gov/cgb/ecfs/>. Filers should follow the instructions provided on the website for submitting comments. For ECFS filers, in completing the transmittal screen, filers should include their full name, U.S. Postal Service mailing address, and the applicable docket number (WC Docket No. 05-196).
- **Paper Filers:** Parties who choose to file by paper must file an original and four copies of each filing. Filings can be sent by hand or messenger delivery, by commercial overnight courier, or by first-class or overnight U.S. Postal Service mail (although we continue to experience delays in receiving U.S. Postal Service mail). All filings must be addressed to the Commission’s Secretary, Marlene H. Dortch, Office of the Secretary, Federal Communications Commission, 445 12th Street, SW, Washington, DC 20554.
- The Commission’s contractor will receive hand-delivered or messenger-delivered paper filings for the Commission’s Secretary at 236 Massachusetts Avenue, NE., Suite 110, Washington, DC 20002. The filing hours at this location are 8:00 a.m. to 7:00 p.m. All hand deliveries must be held together with rubber bands or fasteners. Any envelopes must be disposed of before entering the building.
- Commercial overnight mail (other than U.S. Postal Service Express Mail and Priority Mail) must be sent to 9300 East Hampton Drive, Capitol Heights, MD 20743.
- U.S. Postal Service first-class, Express, and Priority mail should be addressed to 445 12th Street, SW, Washington DC 20554.

Parties should also send a copy of their filings to:

- Byron McCoy, Telecommunications Consumers Division, Enforcement Bureau, Federal Communications Commission, Room 4-A234, 445 12th Street, SW, Washington, D.C. 20554, or by email to [byron.mccoy@fcc.gov](mailto:byron.mccoy@fcc.gov);
- Kathy Berthot, Deputy Chief, Spectrum Enforcement Division, Enforcement Bureau, Federal Communications Commission, Room 7-C802, 445 12th Street, SW, Washington, D.C. 20554, or by email to [kathy.berthot@fcc.gov](mailto:kathy.berthot@fcc.gov); and
- Janice Myles, Competition Policy Division, Wireline Competition Bureau, Federal Communications Commission, Room 5-C140, 445 12th Street, SW, Washington, D.C. 20554, or by e-mail to [janice.myles@fcc.gov](mailto:janice.myles@fcc.gov).

Parties must also serve one copy with the Commission's copy contractor, Best Copy and Printing, Inc. (BCPI), Portals II, 445 12th Street, SW, Room CY-B402, Washington, D.C. 20554, (202) 488-5300, or via e-mail to [fcc@bcpiweb.com](mailto:fcc@bcpiweb.com).

For further information regarding this proceeding, contact David Hunt, Telecommunications Consumers Division, Enforcement Bureau, (202) 418-1522, or Cynthia Bryant, Telecommunications Consumers Division, Enforcement Bureau, (202) 418-8164.